

FILED - GR

August 19, 2022 11:51 AM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY:JMW SCANNED BY: *KB 8/22*

**United State District Court
Western District of Michigan Southern Division**

Robert Taylor,

Plaintiff,

Vs

Thomas Bringman

Defendant

Case number: 1:22 - CV - 519

Hon. Jane M. Beckering

Magistrate Judge Ray Kent

MOTION TO COMPEL

Respectfully presented before the court under Federal Rules of Civil Procedure 37(1) a motion for Forest River, A.K.A. Viking LLC to provide documents demanded under rule 34 as they pertain to Taylor vs. Bringman. Subpoena for documents from Forest River is being contested by one John Conway, an attorney for Forest River. The documents demanded, substantiate a relationship based on electronic communications between Forest River employee John David Overton, City of Three Rivers Police Chief Thomas Bringman and other members of the law enforcement community in St. Joseph County MI where John David Overton is a Deputy sheriff. This communication(s) was carried out during work hours of John David Overton at Viking LLC. in Centreville, MI. Recordings made by government officials have captured John David Overton placing false and malicious calls to St. Joseph County Dispatch and admitting email contact with the defendant while in his work environment.

Respectfully submitted to U. S. District Court via USPS on August 16, 2022.

Robert Taylor
2546 W. Lincoln St.
Springfield MO 65806
417 380 3201



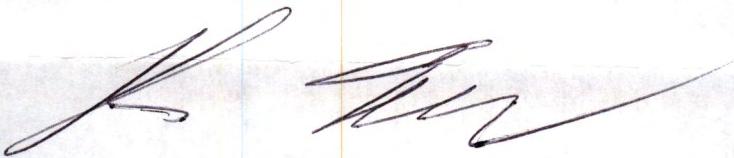
SUGGESTIONS SUPPORTING MOTION TO COMPEL

1. John David Overton is identified as one of several co-conspirators in Taylor v. Bringman.
2. This is proven by audio and video recordings of John David Overton and his written statements.
3. John David Overton is employed by Forest River fulfilling his obligation at Viking LLC.
4. Viking LLC is owned by Forest River and is located in Centreville MI. John David Overton is recorded stating "he is at work" in Centreville MI. while making these calls.
5. John David Overton, with other River Forest employees, stored Viking products for profit on residential zoned lot in Three Rivers owned by John David Overton at 711 Tenth St. Three Rivers MI.
6. Video indicates presence of several employees delivering Viking traveltrailers with vehicles owned by Forest River/Viking LLC.
7. Forest River employee rules and regulations handbook specifically prohibits use of Forest River product for profit by employees.
8. The operation used semi-trucks to remove Viking trailers from the residential lot owned by John David Overton.
9. The semi-trucks blocked the plaintiff, a disabled individual, from receiving door to door public transit service as needed for his handicap.
10. The plaintiff and other property owners attended City of Three Rivers meetings in support of retaining residential zoning rights.

11. John David Overton initiated a campaign of retaliation using family and law enforcement officials provided by the defendant Thomas Bringman, a person known to John David Overton.
12. After many attempts, unlawful arrest of the plaintiff was accomplished using false statements provided by John David Overton.
13. This unlawful arrest was followed by other acts of retaliation by John David Overton in hopes of arresting the plaintiff again.
14. The retaliation of John David Overton is prohibited by Forest River employee handbook.
15. The plaintiff submitted photos in a complaint clearly marked as "ADA related" to David Youmans, Human Resources director for Forest River in Elkhart IN.
16. The plaintiff complained of the retaliation by John David Overton and that with the use of Forest River products, the company had some responsibility to safety of the public, no different than a "drug" policy or a "vaccine mandate".
17. John David Overton acquired that complaint of retaliation and attempted use of it as basis for "harassment" charge against the plaintiff on January 25, 2019.
18. John David Overton falsely claims plaintiff making contact with Chris Mandell, a Forest River supervisor and unknown to plaintiff.
19. That is first recorded call from where John David Overton claims to be at work in Centreville MI.
20. That recording reveals that John David Overton is in contact with defendant Thomas Bringman via email while John David Overton is "at work".
21. St. Joseph County Dispatch incident reports also indicate involvement of a "Lori Overton" who may or may not be employed by Forest River/ Viking LLC.

22. A second call, placed June 28, 2019 by John David Overton once again indicates he is; calling from work; in email contact with Thomas Bringman; able to request specific law enforcement personnel by name from Thomas Bringman; and falsely reports plaintiff guilty of a felony, which is a felony.

These suggestions in support of Motion to Compel fulfillment of subpoena served upon Forest River
Respectfully submitted to U. S. District Court via USPS this 16th day of August, 2022.



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CERTIFICATE OF SERVICE

In the matter of Taylor v. Bringman, Case # 1:22-cv-519, I, Robert Taylor certify under penalty of law the delivery of this Motion to Compel and its suggestions (3 pg.) to USPS for service to Michael Bogren, attorney for the defendant on this 15th day of August, 2022.



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